



**STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
COOKEVILLE ENVIRONMENTAL FIELD OFFICE**

**DIVISION OF WATER POLLUTION CONTROL
1221 SOUTH WILLOW AVENUE
COOKEVILLE, TN 38506**

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December 10, 2010

Mr. Steve McCoy
Utilities Manager
Jamestown Water Department
314 E. Central Ave.
Jamestown, TN 38556

**CERTIFIED MAIL
Return Receipt Requested
Receipt # 91 7108 2133 3937 2214 9366**

**Re: Compliance Evaluation Inspection
City of Jamestown – Water Treatment Plant
NPDES # TN0080969 – Permit Expires June 30, 2015
Receiving Waters: Yellow Creek, Fentress County, TN**

Dear Mr. McCoy:

On November 29, 2010, personnel from the Tennessee Division of Water Pollution Control conducted a Compliance Evaluation Inspection (CEI) at the City of Jamestown Water Treatment Plant (WTP). The purpose of the inspection was to evaluate compliance with the general NPDES permit for WTP filter backwash and sedimentation basin discharge. The discharge is to Yellow Creek.

Permit / Records & Reports

The current general NPDES permit coverage (TN0080969) became effective on September 3, 2010, and will expire on June 30, 2015. The permit requires monthly monitoring for several parameters. All monitoring records should be maintained and kept available at the water plant. Some sample analyses are being conducted at the Jamestown Wastewater Treatment Plant. Records of these analyses should be maintained and kept available at both the water and wastewater plants. The data obtained from the required monitoring are to be reported on Discharge Monitoring Report (DMR) forms and submitted monthly to the Division's Nashville office. Some filter backwash DMRs are being mistakenly submitted to the Division of Water Supply instead of the Division of Water Pollution Control. Please refer to the TN0080969 permit coverage sheet for the correct address to send filter backwash DMRs to. Please also continue submitting copies of each DMR to the Division of Water Pollution Control at the Cookeville Environmental Field Office (EFO) at the letterhead address.

Facility Review

The backwash filter system with discharge was operational. An old clarifier tank is being used as a sedimentation basin. Water from the clarifier tank overflows into a pipe and gravity flows to a drainage

conveyance up-gradient of Yellow Creek. Monthly samples are being obtained directly from the clarifier tank, but should be obtained from the *end of the discharge pipe at the outfall*. A sign needs to be installed at the outfall as required by the permit. Refer to the permit for specific language the sign must contain.

Laboratory

The laboratory and associated equipment and instruments were generally clean and well-organized. Records of sample collection, analysis and equipment calibration and maintenance are being maintained and kept available, but could use some minor improvements. For each instance a sample is obtained at the outfall, the date, time and initials of the person obtaining the sample should be recorded. This also applies for each instance a sample is analyzed in the lab. A summary of the required monthly monitoring parameters and inspection notes/recommendations for each parameter are given in the following table:

Parameter Monitored	Inspection Notes / Recommendations
Flow	The volume of filter backwash water being sent to the clarifier is obtained from a flow totalizer in the plant.
Total Suspended Solids (TSS)	Analysis being conducted at Jamestown Wastewater Treatment Plant. The appropriate standard laboratory method must be used. Records of analysis should be kept available at both the water and wastewater plants.
Settleable Solids	Analysis being conducted at Jamestown Wastewater Treatment Plant. The appropriate standard laboratory method must be used. Records of analysis should be kept available at both the water and wastewater plants.
pH	Analysis being conducted on Hach meter in water plant lab. Meter should be calibrated prior to analysis (on same day) with non-expired pH buffers. Analysis must be conducted within 15 minutes of sample collection. Time sample obtained and time sample analyzed should be recorded with the appropriate person's initials.
Chlorine (total residual)	Analysis being conducted on Hach meter in water plant lab. Meter should be calibrated (zeroed) prior to analysis with distilled water. The appropriate reagent for the <u>total chlorine</u> test must be used. The meter must be configured to measure for <u>total chlorine</u> and not free chlorine. Analysis must be conducted within 15 minutes of sample collection. Time sample obtained and time sample analyzed should be recorded with the appropriate person's initials.
Iron (total)	Analysis being conducted by a certified private laboratory. Records of sample collection and copy of results of analysis should be maintained and kept available at water plant.
Aluminum (total)	Analysis being conducted by a certified private laboratory. Records of sample collection and copy of results of analysis should be maintained and kept available at water plant.

All monitoring results must be summarized on the DMR and submitted to the Division by the 15th of the following month. The number of exceedances column (No. Ex.) should indicate a "0" for monitoring results within the permitted limit or a "1" for results in excess of the limit or if the analysis was not conducted that month.

Recommendations

1. The aforementioned minor improvements to monitoring, recordkeeping and reporting are needed.
2. A quality assurance program for the lab is needed. This typically includes analyzing "duplicate" or "spiked" samples 10% of the time to confirm the results of the regular analyses (i.e. every 10 months for monthly monitoring).

Required Action

1. Install required sign at discharge outfall. This sign must contain the language and meet the size, color, and orientation criteria specified in the permit. Please submit written notification to the Cookeville EFO at the letterhead address upon completion of this action. This action should be completed no later than **January 31, 2011**.

I would like to thank Mr. Jackie Rosenbaum and the personnel at the Jamestown Water Treatment Plant for their time and courtesy during the inspection. If you have any questions, I can be reached at (931) 432-7642 or via e-mail at *Martin.Smith@tn.gov*.

Sincerely,



Martin Smith
Division of Water Pollution Control
Cookeville Environmental Field Office

CC: Mr. Jackie Rosenbaum, Operator, City of Jamestown Water Treatment Plant
Mr. Patrick Parker, WPC Nashville Central Office, Enforcement & Compliance Mgr (*via e-mail*)
Mr. Rob Howard, WPC Cookeville EFO, Program Manager (*via e-mail*)
Mr. Johnny Walker, DWS Cookeville EFO, Program Manager (*via e-mail*)
WPC EFO File (Fentress Co.)

Enclosure: EPA 3560 Form